

**THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

FRIEDA ZEIDEL, individually and on behalf)
of a class of similarly situated individuals,)
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)
 Plaintiff,) No. 13-cv-06989
)
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 v.)
)
)
 YM LLC USA, a Delaware limited liability)
 company, and MOZEON LLC,)
 a New York limited liability company,)
)
)
)
)
 Defendants.)

JOINT STIPULATION TO DISMISS DEFENDANT MOZEO LLC

Plaintiff Frieda Zeidel (“Plaintiff”) and Defendant Mozeo LLC (“Mozeo”) (together, the “Parties”), through their respective counsel, pursuant to Rule 41(a)(1)(A)(ii) of the Federal Rules of Civil Procedure, hereby agree and stipulate as follows:

1. On August 30, 2013, Plaintiff filed her Class Action Complaint in the Circuit Court of Cook County Illinois. On September 30, 2013, Mozeo removed the case to this Court.

2. On October 30, 2013, Mozeo filed its Answer to the Complaint. (Dkt. 9.)
The Parties exchanged initial disclosures on January 15, 2014.

3. On January 15, 2014, this Court entered a case management Order, pursuant to which June 30, 2014 is the deadline to add parties and/or amend pleadings. (Dkt. 12.) The discovery deadline is currently set for September 23, 2014. (Dkt. 12.)

4. On March 21, 2014, Plaintiff filed her First Amended Class Action

Complaint against Mozeo, as well as Defendant YM LLC USA. (Dkt. 14.)

5. Plaintiff and Mozeo have reached a settlement which resolves her claims against Mozeo, and Plaintiff wishes to proceed only as against Defendant YM LLC USA.

6. Pursuant to Fed. R. Civ. P. 41(a)(1)(A)(ii), an action may be dismissed without Court order if stipulated to by the parties who have appeared in this matter. Plaintiff and Mozeo are the only parties who have appeared in this matter.

7. Accordingly, Plaintiff and Mozeo hereby stipulate that the claims asserted in the First Amended Class Action Complaint will be dismissed only against Mozeo, with prejudice as to Plaintiff and without prejudice as to the putative class members, with Plaintiff and Mozeo to each bear their own attorneys' fees and costs.

Dated: April 10, 2014

Respectfully Submitted,

FRIEDA ZEIDEL, individually and on behalf of a class of similarly situated individuals

By: /s/ Evan M. Meyers
One of Plaintiff's Attorneys

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MOZEOLLC

By: /s/ Albert E. Hartmann
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